

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
Case No. 1:20-bk-00774-HWV
MONICA LAFRANCES ALTAMURA, : Chapter 13
Debtor :

:

STONEGATE AT REGENTS' GLEN :
HOMEOWNERS' ASSOCIATION, INC., :
Movant :
: Stipulation in Settlement for Motion for
v. : Relief from Automatic Stay
: by Stonegate at Regents' Glen
: Homeowners' Association, Inc.
MONICA LAFRANCES ALTAMURA :
Respondent :
:

STIPULATION IN SETTLEMENT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY

It is hereby stipulated by and between Aaron S. Marines, Esquire and Russell, Krafft & Gruber, LLP, attorneys for Movant, Stonegate at Regents' Glen Homeowners' Association, Inc., and Dawn Marie Cutaia, Esquire, attorney for Debtor/Respondent, Monica LaFrances Altamura, as follows:

1. The automatic stay of bankruptcy shall remain in full force and effect conditioned upon compliance with the terms of this Stipulation.
2. This Stipulation pertains to the property with an address of 959 Beechin Lane, York, PA 17403 (the "Unit").
3. The Parties agree that the post-petition arrearage amount of amount of \$3,870.87 will be added to the Claim of the Movant, Stonegate at Regents' Glen Homeowners' Association, Inc.

4. The Debtor agrees to file an amended Plan within thirty (30) days to add the post-petition arrearage amount to adjust the payments to the Movant under the Plan.

5. Should the Debtor/Respondent fail to pay the regularly due association assessments due after the entry of this stipulation directly to the Movant, Movant shall send Debtor/Respondent, by first class mail, and his counsel, by email, notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of that Notice, Movant shall file a Certification of Default with the Court, and the Court shall enter an Order granting relief from the automatic stay. The Motion for Relief from Automatic Stay will waive Federal Rules of Bankruptcy Procedure 3002.1 and 4001(a)(3) so that such Order granting relief from the automatic stay is immediately effective and enforceable by Movant.

6. The parties request that this Court sign and docket an Order Approving the Stipulation in Settlement of the Motion for Relief.

Respectfully submitted,
RUSSELL, KRAFFT & GRUBER, LLP

/s/ Aaron S. Marines

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